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November 4, 1997

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *In the Matter of Petition for Expedited Rulemaking to Establish Reporting Requirements and Performance and Technical Standards for Operations Support Systems, RM 9101*

Dear Mr. Caton:

At the request of the staff of the Common Carrier Bureau, attached is a brief analysis of the Local Competition Users Group Service Quality Measurements Detail Document (Version 6.0). Please include the analysis in the record in this proceeding.

In accordance with the Commission's rules governing ex parte communications, an original and two copies are enclosed herewith. Do not hesitate to contact me if you have any questions concerning the foregoing.

Very truly yours,

Todd F. Silbergeld

Attachment

cc: Mr. Stockdale
Ms. Setzer
Ms. Karmarkar
Mr. Olson
Ms. Lader
Mr. Jennings

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**ANALYSIS OF LOCAL COMPETITION USERS GROUP
SERVICE QUALITY MEASUREMENTS DETAIL DOCUMENT
VERSION 6.0**

November 4, 1997

Introduction. On September 29, 1997, LCI International Telecom Corporation (LCI) submitted to the Commission Version 6.0 of the Local Competition Users Group (LCUG) Service Quality Measurements Detail Document (SQM). The telephone operating companies of SBC Communications Inc., Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell (the SBC Companies), respond to the LCUG's proposed SQMs and compare the proposed measurements to those SBC has been discussing with the U.S. Department of Justice (DOJ).

The SBC Companies have several concerns with the measurements proposed by the LCUG. First, the LCUG has proclaimed itself as the "standards body" for performance measurements. The LCUG, however, is comprised of five interexchange carriers (IXCs) that claim to be interested in providing local exchange service. This is hardly an unbiased organization that has the best interests of the entire industry at heart. The SBC Companies would support a standard set of performance measurements that could be used industry-wide, if incumbent local exchange carriers (ILECs) were represented in the standards-setting process.

Second, the LCUG proposes standards for services for which ILECs have no commercial analogue. The LCUG claims that these standards are "based upon best of class and an assessment of the necessary performance to support a meaningful opportunity for CLECs [competitive local exchange carriers] to compete." However, the SBC

Companies have not seen any data to support the LCUG claims. In the absence of any information or evidence, there is a serious concern that these standards have been arbitrarily set at such levels as to ensure that no ILEC will be able to meet them. The motivation for such an action is clear – prevent the Bell companies from entering the interLATA market and protect the LCUG members' market from any real competition.

Performance Measurements. The LCUG measurements are divided into eight categories: Pre-Ordering, Ordering and Provisioning, Maintenance and Repair, General, Billing, Operator Services and Directory Assistance, Network Performance, and Interconnect/Unbundled Elements and Combinations. In general, the SBC Companies have already agreed to provide many of these measurements to competitive local exchange carriers (CLECs) during interconnection contract negotiations. SBC has also provided a detailed description of the measurements to the staff of the DOJ.

The SBC Companies provide CLECs with four methods of obtaining pre-ordering information: DataGate, Verigate, and EASE (SWBT) and CLEO (Pacific Bell and Nevada Bell). The SBC Companies have agreed to provide the average response time for DataGate and Verigate by function (address verification, service and features availability, telephone number assignment, due date availability, dispatch requirements, and customer service records). EASE is the same system that Southwestern Bell uses for pre-ordering and ordering functions. The SBC Companies will provide the average screen to screen response time for EASE. LCUG would require the SBC Companies to provide the same response time for DataGate and Verigate as provided by EASE. All three interfaces access the same "back office" systems. EASE was designed, however, to process some of

the functions in the background while allowing the service representative to continue to obtain information from the customer. Therefore, the screen to screen response time is appropriate. DataGate and Verigate were not designed in the same manner. However, CLECs have the same ability as the SBC Companies to design graphical user interface (GUI) tools for use by its service representatives. In any case, the SBC Companies have met their obligation to provide a meaningful opportunity to compete by providing CLECs with non-discriminatory access to EASE.

The SBC Companies have agreed to provide most of the measurements contained in the Ordering and Provisioning section of the LCUG SQM. In discussions with the DOJ, SBC has agreed to provide average completion interval, percent orders installed within 5 days, percent missed due dates, percent company missed due dates due to lack of facilities, percent installation reports within 10 days (SWBT), (30 days for Pacific Bell and Nevada Bell), percent rejects, percent mechanized rejects within four hours, mean time to return mechanized reject, percent firm order confirmations (FOCs) returned within a specified interval, service order accuracy, provisioning accuracy and percent flow through. In addition, the SBC Companies have agreed in negotiations with members of the LCUG to provide mean FOC interval, mean completion interval, percent orders held greater than 30 days, and percent orders held greater than 90 days. There are two measurements the SBC Companies have not agreed to provide: mean jeopardy interval and percent jeopardies returned. In negotiations with CLECs, all parties have agreed that these measurements would not be provided until such time that the jeopardy process is mechanized.

The SBC Companies have agreed to provide all the Maintenance and Repair measurements listed in the LCUG SQM. In addition, the Companies will provide percent out of service less than 24 hours, as has been discussed with the DOJ.

The General category of the SQM has three measurements: percent system availability, mean time to answer calls, and call abandonment rate. The SBC Companies will provide system availability measurements for all interfaces including Toolbar and the Remote Access Facility (RAF). Average speed of answer will be provided for both the Local Service Center (LSC) and the Local Operation Center (LOC). Call abandonment rate is a measure that is highly correlated with average speed of answer (ASA). The higher the ASA the higher the call abandonment rate. Therefore, this measurement is redundant.

The SBC Companies provide CLECs with a choice of four options for obtaining electronic access to billing information: Bill Plus™, EDI, Customer Network Administration (CNA), and Usage Extract Feed (EMR). The SBC Companies have agreed to provide measurements for timeliness, accuracy, and completeness of billing to CLECs. Southwestern Bell performs a bill audit on a sample of bills prior to releasing the bills to customers. This bill audit process includes both wholesale operations (i.e. unbundled network elements and resale) and retail operations (e.g., access services). The CABS Bill Audit process includes all Feature Groups including "U" for Unbundled Network Elements for CLECs. Specific billing conditions for each Feature Group will be validated, and the same CABS Billing System and Billing Process is used for all Feature Groups. The CRIS Bill Audit Process includes both resale and retail bills. A sample of all types of products/services, class of service, usage (e.g., intraLATA toll plans) will be

reviewed. The same CRIS Billing System and Billing Process is used for the both resale and retail, except resale has the extra step to access percent discount table. The percent discount table is updated/validated when an interconnection agreement is implemented. The number of errors detected in this bill audit process will be reported for the aggregate of the SBC Company and CLEC bills. In addition, the SBC Companies will provide percent of accurate and complete formatted mechanized bills, which measures the percent of accurate and complete formatted mechanized bills via EDI; percent of billing records transmitted correctly, which measures the percent of billing records transmitted correctly on the usage extract feed; billing completeness, which measures the percent of service orders on the bill for the current bill period; and billing timeliness, which measures the timeliness that bills are released by bill type (i.e. paper, Bill Plus, EDI, or BDT).

The SBC Companies will provide the measurements for Operator Services and Directory Assistance that are listed in the LCUG SQM. However, due to the serving arrangement, CLECs and Southwestern Bell are served using the same network ensuring that all customers are served in parity. Therefore, these measurements will be reported on an aggregate basis.

The SBC Companies have strong objections to the measurements in the section entitled "Network Performance". The intent of this measurement is to measure the transmission quality of the loops (subscriber loop loss, signal to noise ratio, idle channel circuit noise, loop circuit balance, circuit notched noise, and attenuation distortion), as well as measuring the speed of connection (dial tone delay, post dial delay, and call completion delivery rate). These measurements reflect engineering standards or guidelines. At the time a circuit, loop, or switch is designed or engineered, it is engineered

to meet certain specifications. This process occurs for both CLEC customers as well as SBC's customers. The process ensures that parity exists for network performance. In order to measure what would be required by the LCUG, a statistically valid sample would be required from each CLEC and the SBC Companies by market area. It was suggested in the AT&T-MCI-Southwestern Bell Arbitration in Texas that, on performance measurements, an appropriate sample might be a maximum of 1,000 lines from each CLEC and Southwestern Bell for each market area be sampled and be reported on a quarterly basis. For illustrative purposes, assume that there will be 50 CLECs in business providing local service in the seven state SBC territory. This would equate to 612,000 observations quarterly (50 CLECs + the SBC Companies = 51 * 1000 observations * 12 market areas). These tests described in the LCUG recommendations would require the SBC Companies to dispatch a technician to the customer premise as well as have a technician available in the central office in order to perform the requested tests. The SBC Companies only conduct this type of testing at the time the service is installed and if a trouble is reported by the customer. Clearly, the SBC Companies do not have the resources to perform this type of testing in order to simply provide a measurement of an "upstream" process when there is no indication a problem exists.

The final category of measurements in the LCUG SQM document is "Interconnection/Unbundled Elements and Combinations". The measurements in this category reflect the availability and accuracy of databases such as AIN, LIDB and 800 number. These databases are deployed on service control points (SCPs) and integrated service control points (ISCPs). The measurements requested are percentage of databases receiving a response, percentage of database queries experiencing time outs, percentage of

database responses with invalid responses with invalid response, mean time for database query, mean time for database updates, and mean Post Dial Delay (PDD) for calls routed to CLEC OS/DA. The SBC Companies and the CLECs access these databases via the Signaling System 7 (SS7) network. Since access to the network will be on a non-discriminatory basis, the CLECs and the SBC Companies will experience the same levels of service. Currently, the SBC Companies do not collect or use the measurements requested except in instances of trouble isolation. There is no mechanized collection process in place. Since parity is ensured by the design of the network, these measurements will only add expensive and burdensome reporting requirements to ILECs.

Beginning in July 1997, SBC has met on numerous occasions with the staff of the Telecommunications Task Force of DOJ to discuss OSS performance measurements. In addition, in the AT&T-MCI-Southwestern Bell Arbitration in Texas, Southwestern Bell, AT&T, and MCI have been in mediation concerning performance measurements. Southwestern Bell, through these efforts, has developed a comprehensive list of measurements that will enable CLECs, the FCC, and the DOJ to ensure that Southwestern Bell has given CLECs a meaningful opportunity to compete in the local exchange market. The negotiation process has produced a joint set of measurements that all parties can support. On the other hand, the LCUG SQM document is a one-sided set of performance measurements that ignored the views of ILECs. Therefore, the SBC Companies respectfully recommend that the Commission reject the LCUG recommendations in favor of a negotiated set of performance measurements where all parties have input to the process.

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